

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND**  
(Greenbelt Division)

|                     |   |                        |
|---------------------|---|------------------------|
| In re:              | : |                        |
|                     | : |                        |
| MAHALIA E. JACKSON, | : | Case No. 23-1-1722-LSS |
|                     | : | Chapter 13             |
| Debtor.             | : |                        |
|                     | : |                        |

**TRUSTEE'S RESPONSE TO  
SECOND MOTION TO MODIFY MORTGAGE LOAN**

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Timothy P. Branigan, trustee in the above-captioned case, responds to the Motion for Authority to Incur Secured Debt etc. The Trustee does not oppose the relief requested. If the pre-petition mortgage arrears are to be wrapped into the new loan, the plan should be amended accordingly. Plan confirmation will be considered separately. The Debtor should file a new Schedule J to reflect the new circumstances.

Respectfully submitted,

July 10, 2024

/s/ Timothy P. Branigan  
Timothy P. Branigan (Fed. Bar No. 06295)  
Chapter 13 Trustee  
9891 Broken Land Parkway, #301  
Columbia, Maryland 21046  
(410) 290-9120

**Certificate of Service**

I hereby certify that the following persons are to be served electronically via the CM/ECF system:

Eric Steiner, Esq.

I caused a copy of the foregoing to be sent on July 10, 2024 by first-class U.S. mail, postage prepaid to:

Mahalia Jackson  
5504 Sir Douglas Drive  
Bryans Road, MD 20616

/s/ Timothy P. Branigan  
Timothy P. Branigan (Fed. Bar No. 06295)